OhioEPA
State of Ohio Environmental Protection Agency
P.O. Box 1049, 1800 WaterMark Dr.
Columbus, Ohio 43266-0149

DRAFT COPY
SUBJECT TO REVISION
OEPA

Richard F. Celeste
Governor

August 14, 1989

Timet
100 Titanium Way, P.O. Box 309
Toronto, Ohio 43964

Re: Review of your FDF and 301(c) variance applications

Dear Sir:

Enclosed please find copies of our reviews of your FDF and 301(c) variance requests. We have tentatively decided to deny your requests. The reason for each denial has been explained in our reports.

In our report for your FDF request you will find that we considered your interpretation of the factor "the nature or quality of pollutants contained in the raw wasteload of the Timet's process wastewater" misses the point the guideline attempts to make. Our interpretation is as follows.

Federal guidelines state that, decreased flow and end-of-pipe treatment would reduce the discharge of metal priority pollutants, conventional pollutants and non-conventional pollutants. BAT guidelines are not meant only for removal of toxic pollutants, namely cyanide, lead and zinc. The act establishes BAT as the principal means of controlling the direct discharge of toxic and non-conventional pollutants to navigable waters (supporting section of Federal Regulations, Page 34244, enclosed). Page 34251 of the Federal Register (copy enclosed) states, "The Agency is promulgating BAT limitations on the basis of lime and settle end-of-pipe treatment and in-process controls to reduce wastewater flow (option 2)". Fluoride is the single most loaded pollutant that can be removed by same option 2 BAT treatment (copy of development document, Page 1811 enclosed). U.S. EPA believes that it is not cost effective to add filtration in the lime and settle treatment for removal of pollutants (priority, conventional and non-conventional). To explain their belief, they cited the example of the removal cost of priority pollutants only. They made a cost comparison with and without addition of filtration as part of the treatment for that category of pollutants. From this, one cannot conclude that the guideline is intended to regulate the toxic pollutants-cyanide, lead and zinc only.

In our report for your 301(c) variance application, you will find our discussing the use of BAT regulatory flow control over normalized BPT flow. Counter current cascade rinsing and spray rinsing are suggested means for BAT regulatory flow. The enclosed copy of the development document pages 1458 and 1459 depict counter current rinsing (tanks) and the effect of added rinse stages on water use.

We hope the above explanation will help you in analyzing our review of your variance requests. If you have any questions, please contact Swaraj K. Chakrabarti of my staff at (614) 644-2001.

Sincerely,

John J. Sadzewicz, P.E.
Manager, Permits Section
Division of Water Pollution Control

JJS/SC/mds
0089F/14-15

Enclosure